

**REMARKS**

The Examiner is thanked for the careful examination of the application.

However, in view of the foregoing amendments and remarks that follow, the Examiner is respectfully requested to reconsider and withdraw the rejections.

In response to the claim objection, the claims have been carefully reviewed and revised where necessary to ensure that all claim elements have proper antecedent basis.

Claims 1, 2, 5 – 7, 9, 12, and 13 have been rejected under 35 USC 102(b) as being anticipated by USP 6,720,951, hereinafter *Taguchi*. In response to that rejection, all of the independent claims have been amended to clarify that the “key image layout modifying unit” and the method element of “modifying the layout” are automatic. Support for the amendment may be found in paragraph [0008] of the published application.

In the *Taguchi* system, the feature that the Examiner alleges corresponds to the “key image layout modifying unit” and the method element of “modifying the layout” is done manually. See column 5, lines 1 – 41, for one example. *Taguchi* does not teach or even suggest that the “key image layout modifying unit” and the method element of “modifying the layout” are automatic.

The differences in operation and the advantages thereof should be readily apparent. Accordingly, claims 1, 2, 5 – 7, 9, 12, and 13 are patentable over the applied prior art.

Claims 3, 4, 8, 10, and 11 have been rejected under 35 USC 103(a) as being unpatentable over *Taguchi* in view of other secondary references. However, such other references do not overcome the deficiencies of *Taguchi* that are set forth

above. Accordingly, claims 3, 4, 8, 10, and 11 are also patentable over the applied prior art.

In the event that there are any questions concerning this amendment, or the application in general, the Examiner is respectfully urged to telephone the undersigned.

Respectfully submitted,

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